

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

AUG 23 2014

MCALLEN DIVISION

UNITED STATES OF AMERICA  
v.

CRIMINAL COMPLAINT

David J. Bradley, Clerk

Rene Flores-Garcia  
A202 075 820

YOB:

PRINCIPAL  
1964

United States

Count 1

Case Number:

M-14-1646-M

Edwin Bartolo Echegoyen-Beltran  
A088 335 522

YOB:

CO-PRINCIPAL  
1986

El Salvador

Count 1

Geronimo Rodriguez-Zapata  
A078 975 786

YOB:

CO-PRINCIPAL  
1971

Mexico

Count 2

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 21, 2014 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

Count 1 - 1324(a)(1)(A)(ii)

knowing or in reckless disregard of the fact that Deysi Escalera-Lopez, citizen and national of Mexico, and Alexis Antonio Veliz-Campos, citizen and national of Guatemala, along five (5) other undocumented aliens, for a total of seven (7), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Donna, Texas to the point of arrest near Pharr, Texas,

Count 2 - 1324(a)(1)(A)(iii)

knowing or in reckless disregard of the fact that Deysi Escalera-Lopez, citizen and national of Mexico, Jose Rogelio Alvarez-Umana, citizen and national of El Salvador, and Alexis Antonio Veliz-Campos, citizen and national of Guatemala, along with thirty-one (31) other undocumented aliens, for a total of thirty-four (34), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation;

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(1)(A)(iii). I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the

On August 21, Border Patrol Agents (BPAs) received information from an undocumented alien in custody regarding a suspected harboring residence located at 1505 Campeche St. Apartment #2 in Donna, Texas.

Based on the information, BPA R. Salinas conducted surveillance at the location. While doing so, he received information from a concerned citizen who advised there was suspicious activity taking place at Apt #2. The citizen explained several vehicles would arrive at all hours and drop off suspected illegal aliens.

SEE ATTACHED:

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Howard Gessler Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

August 23, 2014  
Date

McAllen, Texas  
City and State

Peter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14-1646-M**

<b>RE:</b>	<b>Rene Flores-Garcia</b>	<b>A202 075 820</b>
	<b>Edwin Bartolo Echegoyen-Beltran</b>	<b>A088 335 522</b>
	<b>Geronimo Rodriguez-Zapata</b>	<b>A078 975 786</b>

The citizen then contacted BPA Salinas and stated approximately 15 subjects had left the property in a green minivan. The citizen also claimed they observed a large group of possible illegal aliens inside and one of the subjects asked for food.

BPA Salinas returned to the location to continue surveillance and observed a black sedan arrive at the complex. Shortly after, several subjects exited Apt. #2 and quickly boarded a brown Ford F-150 pickup which was parked. The Ford-F150 then departed the area and Hidalgo County Constables Office were contacted to provide assistance.

Deputy R. Alvarez located the pickup and attempted a traffic stop for an unsafe lane change on Expressway 83. The pickup failed to yield and ultimately came to a stop on Warren St. in Pharr. Approximately 13 subjects were observed jumping out of the bed and cabin area of the pickup attempting to abscond. After searching the area, Agents were able to locate 8 subjects in the vicinity of the bailout. One subject, identified as Rene Flores-Garcia, claimed to be a United States citizen. The seven other subjects admitted to being illegally present in the United States. A search of the area for the other subjects returned with negative results. All of the subjects were then transported for further questioning and processing.

Agents returned to the apartment complex in an effort to conduct a consent to search for illegal aliens. When Agents knocked nobody answered the door, so Agents proceeded to draft a search warrant to gain entry. As Agents secured the area, they noticed several subjects fleeing from the Apartment complex and Apt. #2. Several of the subjects who attempted to abscond were apprehended and admitted being illegally present in the U.S. Based on the apprehensions, Agents once again knocked on the door and a male subject answered. The subject then granted Agents consent to enter. Agents encountered a large group of subjects inside the apartment and determined all were illegally present in the U.S. Twenty-eight subjects in total were taken into custody and transported for processing.

Based on statements taken, Agents were able to link three subjects to alien smuggling in this case. Rene Flores-Garcia was the transporter, Edwin Bartolo Echegoyen-Beltran was the foot guide for the illegal aliens, and Geronimo Rodriguez-Zapata was the caretaker. An arrest warrant will be generated to seek the arrest of Rodriguez-Zapata since he is not in custody.

**PRINCIPAL STATEMENTS:**

1. Rene Flores-Garcia was read his Rights and provided a statement. He stated he received a call from a subject who asked if he wanted to earn some money by picking up illegal aliens. He claimed the subject is nicknamed "Colocho" and he wires him the payment from Houston. His instructions were to pick up the illegals at the house and transport them to Encino and drop them off to walk around the checkpoint.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14-1646-M**

<b>RE:</b>	<b>Rene Flores-Garcia</b>	<b>A202 075 820</b>
	<b>Edwin Bartolo Echegoyen-Beltran</b>	<b>A088 335 522</b>
	<b>Geronimo Rodriguez-Zapata</b>	<b>A078 975 786</b>

He further stated on the previous occasions he has smuggled aliens, "Colocho" instructs him to drop off the vehicle at the residence and give the keys to a subject known as "Genaro." Genaro was identified as Geronimo Rodriguez-Zapata who is not in custody at this time. When it was time for him to smuggle the aliens on today's date (8/21), he arrived in his car and got in the tan colored truck. Several subjects then asked if he was the driver, to which he replied "yes," and the subjects boarded the truck. Flores advised the person in the passenger seat with him was the foot guide. He stated his name was Edwin and he was giving orders as they drove. While they were being followed, Edwin was telling him to stop so they could all run. Flores identified Edwin Bartolo Echegoyen-Beltran as the passenger in the vehicle and foot guide.

2. Edwin Bartolo Echegoyen-Beltran was read his Rights and provided minimal information regarding his arrest and smuggling arrangements.

3. Geronimo Rodriguez-Zapata is not in custody and will be sought through an arrest warrant.

**MATERIAL WITNESS STATEMENTS:**

All of the material witnesses were read their Rights and provided statements.

1. Deysi Escalera-Lopez claimed to be a citizen of Mexico and illegally entered into the United States. Escalera paid \$2,700 as an advance for her smuggling fee and made arrangements to pay \$1,800 once she arrived in Los Angeles, California. After her entry, Escalera was transported to the harboring location where she remained for 15 days. While at the location, she claimed there were two men in charge of the apartment. She identified Geronimo Rodriguez-Zapata as one of those men. The other was not identified. Escalera further stated Rodriguez-Zapata was responsible for feeding them. She then stated on (8/21), they were told to get in a tan colored truck. She boarded the truck and sat inside on the rear driver's side. The driver, identified as Rene Flores-Garcia, instructed them to remain quiet as they got in. The police began to follow them and the truck ultimately came to a stop and the subjects ran.

2. Jose Rogelio Alvarez-Umana claimed to be a citizen of El Salvador and illegally entered into the U.S. He stated his family made the smuggling arrangements and he was unaware of the amount paid. After his entry, Alvarez was ultimately transported to the apartment where he was arrested. He further stated when he arrived, a man asked for their names and wrote them on a notebook. The man was the owner of the house and provided food for them every day. He also gave them orders and instructed them not to go outside. On one occasion, Alvarez asked the man when he would be leaving and requested to be allowed to leave. The man then pushed him back into the house and did not allow him to leave. Alvarez identified Geronimo Rodriguez-Zapata as the caretaker and man mentioned. On today's date (8/21), Alvarez added a truck arrived and loaded several subjects that were inside the apartment. Alvarez was able to look out the window and see the driver of the truck. He identified Rene Flores-Garcia as the driver of the truck he observed.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14-1646-M**

<b>RE:</b>	<b>Rene Flores-Garcia</b>	<b>A202 075 820</b>
	<b>Edwin Bartolo Echegoyen-Beltran</b>	<b>A088 335 522</b>
	<b>Geronimo Rodriguez-Zapata</b>	<b>A078 975 786</b>

3. Alexis Antonio Veliz-Campos claimed to be a citizen of El Salvador and illegally entered into the United States. Veliz made arrangements to pay \$3,500 once he was smuggled to his destination. After his entry, Veliz stated he was taken to several stash houses and ultimately arrived at a final location where he stayed for several days. During his stay, he claimed one person was in charge and Veliz identified Geronimo Rodriguez-Zapata as the caretaker of the apartment. He further stated he was taken out on today's date (8/21) and climbed into the bed of a truck. The persons in the bed of the truck were then covered with a tarp and transported north. The vehicle was then pulled over by police and all of the subjects attempted to run.